

# **EXHIBIT A**

**Response:**

CGG objects to this Request as irrelevant and beyond the scope of discovery because any such communications are not relevant to any of the claims or defenses at issue in this case. Simply put, there is no material relevant fact at issue in this matter that such documents would tend to make more or less likely. Based on this objection, CGG will not produce any documents in response to this Request.

**Second Request No. 2:**

Documents sufficient to show the total number of contributors, and total amount of contributions received by the Coalition for Good Governance as a result of fundraising efforts concerning the Litigation, including but not limited to the total number and amount of contributions received by the Coalition as a result of your joint fundraising effort(s) with Fair Fight or Fair Fight Action.

**Response:**

CGG objects to this Request as irrelevant and beyond the scope of discovery. There is no material relevant fact at issue in this matter that such documents would tend to make more or less likely. Based on this objection, CGG will not produce any documents in response to this Request.

**Second Request No. 3:**

All communications between you and the following individuals or organizations, or any persons employed by or acting on behalf of such individuals

or organizations, which concern or relate to the Litigation or Georgia's Election System, including documents related thereto:

- a. L. Lin Wood, Jr.;
- b. Sidney Powell;
- c. Garland Favorito;
- d. VoterGA;
- e. Members of the Arizona State Senate;
- f. Free Speech for People or The North Carolina Chapter of the NAACP;
- or
- g. Any candidate on the ballot for election to federal, state, or local office in the 2020 General Election or Primary, or the 2021 Runoff Election.

**Response:**

CGG objects to this Request as irrelevant and beyond the scope of discovery because any such communications are not relevant to any of the claims or defenses at issue in this case. There is no material relevant fact at issue in this matter that such documents would tend to make more or less likely. Based on this objection, CGG will not produce any documents in response to this Request.

**Second Request No. 4:**

All documents or communications related to the "important and time-sensitive issue" raised with the Court in the Litigation via electronic mail on or about

December 23, 2020, including but not limited to any such documents or communications between you and the Court *ex parte*.

**Response:**

CGG objects to this Request as irrelevant. It was the Curling Plaintiffs that raised the “important and time-sensitive issue” on or about December 23, 2020. CGG made no *ex parte* communications. Additionally, any communications related to the issue are protected by attorney-client, work-product, and other relevant privileges. Based on this objection, CGG will not produce any documents in response to this Request.

**Second Request No. 5:**

All communications between you and any individual who is not participating as an expert witness or counsel in the litigation concerning the July 1, 2021 report of Dr. J. Alex Halderman in the Litigation, and any documents related thereto.

**Response:**

CGG objects to this Request as irrelevant and beyond the scope of discovery because any such communications are not relevant to any of the claims or defenses at issue in this case. There is no material relevant fact at issue in this matter that such documents would tend to make more or less likely. CGG therefore also objects that it would be unduly burdensome to search for communications which, if they exist,

could only show that CGG is aware of the existence of the report. Based on these objections, CGG will not produce any documents in response to this Request.

**Second Request No. 6:**

All communications between you and any declarant or fact witness upon whom you intend to rely, in whole or in part, at summary judgment or trial in the Litigation, and any documents related thereto.

**Response:**

CGG objects to this Request in that it has no contextual parameters that would limit its scope to matters relevant to the subject matter of this litigation. Additionally, four members of CGG are declarants and co-plaintiffs. CGG therefore objects that this request is overbroad because it seeks “all” communications with some of its members, without any limits for time, content, or context. CGG also objects to the extent that this Request violates the common interest privilege. CGG is willing to meet and confer as to whether there is a reasonable scope of this Request that can be narrowed to seek relevant, non-objectionable documents.

**Second Request No. 7:**

All communications between you and any member of the Coalition for Good Governance concerning the Litigation, and any documents related thereto.

**Response:**

This Request is nearly word-for-word identical to Request No. 22 in “Defendant Brad Raffensperger’s First Request For Production of Documents to the Coalition For Good Governance,” which was served on CGG December 30, 2020. CGG objects today for the same reasons they objected to that previous Request. The Court has already sustained the objection on the previous, near-identical, request. (Doc. 1171, p. 2). Therefore, CGG will not produce documents responsive to this Request.

**Second Request No. 8:**

All documents or communications concerning membership with the Coalition for Good Governance, including but not limited to registration processes, dues, responsibilities, obligations, or benefits of membership.

**Response:**

CGG will produce responsive documents.

**Second Request No. 9:**

Any and all documents or communications concerning the membership status of Jasmine Clark, Dana Bowers, Brian Blosser, and any communications with such individuals concerning the Litigation.

**Response:**

CGG objects to this Request as irrelevant and beyond the scope of discovery. CGG further objects that the Request lacks any temporal limitations. There is no material relevant fact at issue in this matter that such documents would tend to make more or less likely. CGG also objects to the extent that such communications are protected with the attorney-client, work-product, or other relevant privilege. CGG will not produce any documents in response to this Request.

**Second Request No. 10:**

All communications between you and any member of a County Board of Elections & Registration, or any such separate boards thereof to the extent applicable, concerning the Litigation or Georgia's Election System, and any documents related thereto.

**Response:**

CGG objects to this Request as irrelevant and beyond the scope of discovery. There is no material relevant fact at issue in this matter that such documents would tend to make more or less likely.

Without waiving the foregoing objection, CGG will produce documents responsive to this Request.